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September 1, 2009

Sheila Eckman, Unit Manager
Site Cleanup Unit #3
Office of Environmental Cleanup
U.S. Environmental Protection Agency, ECL-111
1200 Sixth Avenue
Seattle WA 98101

Re: Response to Request for information Pursuant to Section 104(e) of CERCLA for
the Lower Duwamish Waterway Superfund Site, Seattle, Washington

Dear Ms. Eckman:

This letter is timely written on behalf of Stores Delivery Service, Inc. dba Sound Delivery Service, Sound Delivery Warehouse, LLC and Sound Delivery Logistics, LLC in response to a CERCLA Section 104(e) Request for Information from U.S. Environmental Protection Agency, Region X, dated July 21, 2009 with respect to the above-referenced matter. The enclosed responses are provided, after a diligent search of business records and correspondence, in the same order as the questions were set forth in the subject Request for Information.

I trust that this letter and attached responses adequately responds to the subject Request for Information. Nothing contained herein shall constitute or be deemed to be an admission of any fact, issue of law, responsibility or liability on the part of Sound Delivery, nor is it intended to or shall it be considered as a waiver of any defense, right or entitlement that Sound Delivery may possess now or in the future.

If you have any questions, comments or concerns regarding this response to the Request for Information, please do not hesitate to contact me at the above phone number or address.

Sincerely,

Margaret A. Yowell

Enclosures
cc: Terry J. Lawrence

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Sound Delivery Service, Inc.
Response to CERCLA 104(e) Information Request

Response to Question 1: Respondent Information:

- a. Stores Delivery Service, Inc. dba
 Sound Delivery Service

 Sound Delivery Warehouse, LLC

 Sound Delivery Logistics, LLC

 P.O. 58722
 Seattle, WA 98138

- b. Terry J. Lawrence
 Vice President
 9999 8th Ave. S.
 Seattle, WA 98108

 Telephone: 206-762-3564
 Fax: 206-763-1764

- c. Terry J. Lawrence
 Vice President
 9999 8th Ave. S.
 Seattle, WA 98108

 Telephone: 206-762-3564
 Fax: 206-763-1764

 With a copy to:

 Margaret A. Yowell
 Foster Pepper PLLC
 1111 Third Avenue
 Suite 3400
 Seattle, Washington 98101

 Telephone: 206-447-7290
 Fax: 206-749-1948

- d. From August 2006 thru October 2006, Sound Delivery Service held a short-term lease interest at the Boyer Logistics facility, 7225 2nd Ave. S., for the purpose of storing fabricated steel items. Loads would arrive by semi-truck; product would be offloaded and stored for a short duration of time on eight 4 x 4 wood boards for the purpose of storage; then reloaded back onto trucks for delivery to a jobsite in the local area..

Since February 2000, Sound Delivery Service leases warehouse space from Jones Washington Stevedoring Services of America, 7245 W. Marginal Way S.W. for storage of steel products and wood products. Fabricated steel products were placed on eight 4 x 4 wood boards for the purpose of storage.

Since 1970, Sound Delivery Service has provided flatbed trucking for numerous customer's involved in freight service shipping within the ½ mile radius of site.

- e. See Response to e above.
- f. See Response to e above.
- g. See Response to e. above for materials used or created by activities at the Site. No building debris or other wastes were generated at any of the sites.
- h. N/A. Sound Delivery Service, its parent corporation, subsidiaries or other related or associated companies have not filed for bankruptcy.

Response to Question 2: Site Activities and Interests:

- a. Sound Delivery Service entered into a Rental Agreement dated August 19, 1994 with Jones Washington Stevedoring Services of America, which is enclosed herein. The warehouse was leased upon a gentlemen's agreement from Boyer Logistics. Invoices documenting the agreement with Boyer Logistics are also enclosed. There are no documents regarding environmental conditions.
- b. This site was at the time an undeveloped parcel of land. No improvements were required for the purpose of Sound Delivery Service's use.
- c. N/A
- d. This land had been leased for the purpose of storing truck load quantities of fabricated steel. A forklift had been moved to this site prior to trucks arriving. Loads would be unloaded from the truck and placed on the ground on wood for storage. After a short period of storage loads were then reloaded back onto trucks for delivery to jobsite.
- e. N/A
- f. N/A
- g. N/A
- h. N/A
- i. N/A

Response to Question 3: Information About Others:

- a.
 - i. Boyer Towing and Logistics is a service provider for many of Sound Delivery Service's customers. Sound Delivery Service hauls various loads of products into Boyer for furtherance to Alaska. Boyer is also a customer of Sound Delivery and is capable of hiring Sound Delivery to haul their products. Sound Delivery Service also leased (short term) the property located at 7225 2nd Ave. S. on one occasion for the purpose of storage of fabricated steel.
 - ii. CDM Constructors Inc. is unknown to us. It is believed that Sound Delivery Service never worked for this customer either directly or indirectly.
 - iii. Kelly-Ryan Inc. is a company that purchases steel thru many of Sound Delivery Service's customers. In these cases Sound Delivery Services will haul their product into the Boyer facility for a third party billing. On rare occasions Sound Delivery will be hired directly by Kelly-Ryan to move their products.
 - iv. PCT Construction, Inc. is another company unknown by name to Sound Delivery Services. The company does not believe that it has ever done work for them.
- b. N/A
- c. N/A

Response to Question 4: Financial Information:

a. Question 4.a. requests copies of all federal income tax documents, including all supporting schedules, for 2004, 2005, 2006, 2007 and 2008. Sound Delivery Service respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Further, given Sound Delivery Service's limited relationship to the Site, these documents are not relevant and material to EPA's investigation.

Notwithstanding Sound Delivery Service's objections to this request, Sound Delivery's federal Tax Identification Number is 910620737.

b. Sound Delivery Service holds no financial interest in, control of, or a beneficiary of any assets (in the U.S. or in another country) that have not been identified in its federal tax returns and in the responses to requests above.

c. Sound Delivery Service is not, and was not at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity.

Response to Question 5: Insurance Coverage:

a. Question 5.a. requests copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or Sound Delivery Service's business operation (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies).. Sound Delivery Service respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Further, given Sound Delivery Service's limited relationship to the Site, these documents are not relevant and material to EPA's investigation. Notwithstanding Sound Delivery Service's objections, Sound Delivery Service encloses Certificates of Liability Insurance dated July 25, 2005 and July 31, 2006 issued to Sound Delivery Service by Brown and Brown of Washington.

b. Sound Delivery Service does not have information about any additional insurance policies responsive to this request.

c. Sound Delivery Service respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e). Sound Delivery's insurance brokers/agents who placed insurance for Sound Delivery during the period being investigated is David Allison of RIS Compliance Services, telephone number 360-668-9659, formerly with Brown and Brown of Washington.

d. There were no claims made by or on behalf of Sound Delivery Service under any insurance policy in connection with the site.

e. There were no settlements with any insurer in connection with the site, or for any claims for environmental liability during the time period under investigation.

f. Sound Delivery Service respectfully objects to this request as being overbroad, unduly burdensome and beyond the scope of authority granted to the U.S. Environmental Protection Agency in CERCLA Section 104(e).

g. Sound Delivery Service retains its documents at least for the periods of time mandated by law.

Response to Question 6: Compliance with the Request:

a. Terry J. Lawrence, Vice President, Stores Delivery Service, Inc. prepared this response. The documents reviewed are kept in Sound Delivery Service's offices at 9999 8th Avenue S., Seattle, Washington 98108.

Nothing contained herein shall constitute or be deemed to be an admission of any fact, issue of law, responsibility or liability on the part of Sound Delivery, nor is it intended to or shall it be considered as a waiver of any defense, right or entitlement that Sound Delivery may possess now or in the future.